

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case No.: 5:15CR00319-DCN-1
	:	
Plaintiff,	:	
	:	
vs.	:	JUDGE DONALD C. NUGENT
	:	
LEROY S. STEELE,	:	<u>MOTION TO INCLUDE DEFENDANT'S</u>
	:	<u>ACCEPTANCE OF RESPONSIBILITY</u>
Defendant.	:	<u>IN JUDGMENT ENTRY</u>

NOW COMES the Defendant Leroy S. Steele, by and through his undersigned counsel, and respectfully moves this Honorable Court to include in Defendant's Journal Entry, a level reduction for Acceptance of Responsibility to Defendant's 240 month sentence, under U.S.S.G. §§ 3E1.1(a) and (b), as related in the Plea Agreement entered between the Parties and as reflected, on the record, in the Court's Findings set forth at the April 26, 2017 Sentencing Hearing. As discussed in Chambers, this results in a sentence for the Defendant at a Level 32 with a Criminal History Category of VI for 240 months minus three levels for Acceptance of Responsibility to a Level 29 Criminal History Category VI for a sentencing range of 151 – 188 months.

Respectfully submitted,

/s - ANGELO F. LONARDO, ESQ.

YELSKY & LONARDO
BY: ANGELO F. LONARDO, ESQ.
Ohio Reg. No. 0032274
323 W. Lakeside Avenue, Suite 450
Cleveland, Ohio 44113
(216) 781-2550 - phone
(216) 781-6688 - telefax
aflonardo@yelskylonardo.com - email

Counsel for **LEROY S. STEELE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26th day of April, 2017, a copy of the following was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ - Angelo F. Lonardo

ANGELO F. LONARDO, ESQ.